Olin

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March 8, 1995

Nancy Smith
Acting Connecticut Site Assessment Manager
U.S. Environmental Protection Agency
Region I
J. F. Kennedy Federal Building
Mail Stop HSS
Boston, Mass. 02202-2211

Subject : Pine Swamp Hamden, Ct.
CERCLIS # CTD980521082
Draft Site Inspection Report

Dear Ms. Smith:

Thanks for your time to discuss the status of the subject draft Site Inspection Prioritization Package ("SIPP") for the Pine Swamp site and for forwarding a draft copy to us. We appreciate the opportunity for Olin to review the draft package completed by CDM and offer points of correction and clarification where appropriate. We have identified several key items which should be addressed in the final SIPP. Our comments are summarized and attached to this letter.

Our principle concern with the SIPP is that the SIPP procedure is not well suited for evaluating sites where ongoing remedial actions are in progress. The SIPP is designed for generating data for input to a mathematical model which presumes that little information is known about a site and no action is being taken to address hazardous substances at the site. At Pine Swamp, a full Remedial Investigation Study ("RIS"), certified by Clean Sites as consistent with the National Contingency Plan and overseen by the Connecticut Department of Environmental Protection ("CDEP"), has been conducted. The RIS fully and comprehensively evaluated the hazardous substances at the site, their potential to migrate to the environment and their impact on the surrounding area. The RIS results, like the SIPP, describe the source areas of hazardous substances at the site, but the extensive RIS site characterization work establishes that the source areas' impact on the surrounding area is minimal. The SIPP results ignore the extensive evaluation of contaminant migration and the exposure assessment in the RIS.

Moreover , CDEP-approved remedial actions are ongoing to address the hazardous substances at the site. As our comments to the SIPP discuss, several source areas at the site have already been remediated and wastes removed. A soil vapor extraction system is currently operating at the site. Olin was in the process of developing a final site remediation plan for submission to CDEP when USEPA began its SIPP process last year. These plans have been temporality put on hold until USEPA has made a decision on its role in site oversight because it would be unwise to proceed with the development of a remediation plan which may be ultimately considered inappropriate by USEPA, potentially even after implementation.

Olin would like to discuss the status of the site with you as you develop a recommended course of action. Ultimately, we believe you will concur with our position that the site is being adequately addressed under state authority and that active federal involvement with the site is not necessary for an adequate remedy. To this end, we would like to accept Jane Dolan's original offer to meet with you. If a recommendation will be developed in the final SIPP we would like to meet with you before the comments are submitted to CDM on March 17, 1995. We will contact you this week to set up a meeting.

Thank you again for your time in consideration of the enclosed . If you have any questions on the attached comments or other issues related to the site, please contact me at 203-356-2732. Thank you.

Sincerely,

Redding Thompson
Olin Corporation

encl.

cc:

N. O. Neunaber (N and N Associates)
K. Cichon (MPI)
D. Zimmerman (CDEP)
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PINE SWAMP DRAFT SITE INSPECTION REPORT

REVIEW COMMENTS

General Comments

Waste /Source Data Evaluation

While we understand that the standard site inspection report format includes establishing reference (background) locations, the study history and documentation of the site are mature enough to include complete site characterization consistent with EPA Remedial Investigation Study (RIS) format certified consistent with the NCP by Clean Sites, Inc. For this reason, to compare concentrations in well documented waste disposal locations with background does not add to the site description beyond confirming the results of the RIS.

The SIPP protocol of comparing site sampling data to a background or reference sample is a useful technique for establishing the potential existence of waste materials or a release to a pathway at an uncharacterized site. However, this site is fully characterized by the work to date. The existence, nature and extent of waste areas and potential mobility within the environment of waste constituents have been determined. Consequently we feel that comparison to reference data is inappropriate at this phase of the site program. We are concerned as to how the quantitative comparison to background will ultimately affect the conclusions reached.

Waste Disposal Dates

Throughout the document, reference is made to waste disposal dates on site which are inconsistent with our working knowledge of this location. Due to the nature of earlier operations at Pine Swamp (powder storage and munitions testing), the limited and highly controlled access to the site would have precluded any regular waste disposal before those operations ceased in the 1950's. Therefore, we feel that identifying onsite waste disposal as early as the year 1900 is inaccurate.

Waste Locations

The report acknowledges that remedial activities have been completed under the Interim Corrective Measure (ICM) program. However, it identifies several areas as continuing sources of contamination on the site. The West Burning Grounds, Shotgun Proofing Area, and Trap Sand piles are characterized as soil pathways even though the sources as characterized in the RIS have been remediated under the ICM.

The West Burning Ground was completely removed to remedial criteria and is no longer present onsite. The Shotgun Proofing Area was substantially remediated and only a small quantity of empty shell casings remain at the location. Of the seven identified Trap Sand piles, three pile locations (I, III, and IV) were removed to the remedial criteria and are no longer present onsite. Of the remaining four piles, two (VIA and VIB) overlie the battery waste area, are commingled with it and do not represent a separate source or additional volume. The remaining two piles (II and V) were removed to meet the EP toxicity criteria but exceeded the CDEP direct exposure criterion and were therefore covered with clean fill and then seeded to prevent erosion. Only a limited portion of these last two piles remain onsite as discrete sources. We feel that the inclusion of these removed sources in various tables, figures, and text is an inaccurate representation of existing conditions.

Status of Shotgun Proofing Area and Trap Sands

In addition to the comment above questioning why these areas are considered ongoing sources of contamination, the report states incorrectly that these areas were identifed during the ICM as additional source areas. These areas were studied and characterized as part of the RIS in 1988 and were addressed as part of the ICM.

Use of Sample SD-08

Sample SD-8 was taken from the edge of the battery waste disposal area on the south side of Pond A. The sample is not a pond sediment sample, but a sample of waste material from the battery waste disposal area. Given the other data developed for the site, the use of this sample point to establish a release to surface

water is inappropriate. The battery waste area has been present for nearly 40 years and the surface water, fish tissue, and sediment data developed by the RIS and downstream sediment sampling by CDM clearly show no transport of hazardous substances along the surface water pathway. Use of this sample point ignores the extensive, and far more comprehensive, characterization of surface water and sediment already developed. Sample point SD-8 provides no information on surface water quality and should not be used as an indication of surface water impact when better, and more complete, data is available.

Use of "B'd" RIS Data

The use of RIS data which has been qualified with a "B" (compound present in blank) is inappropriate. The SIPP text on page 44 cites the detection of PCB in the sample without acknowledging that the compound was also present in the blank. Consistent with CLP protocols for data validation, the RIS discounted the reported detection of PCB in the incinerator ash sample due to blank contamination. This data is not considered valid.

Specific Comments

Note : These comments generally follow the sequence of the text. Reference is not always made to specific instances requiring correction which are discussed under the "General comments" section above.

1. Dixwell Avenue is located west of the property, not east.

2. While the ponds on Pine Swamp are 0.1 miles from Lake Whitney itself, they are several miles upstream from the reservoir's actual treatment intake location.

3. The nearest occupied residential structure to the site is actually on Leeder Hill Drive abutting the site's eastern boundary.

4. Figure 2 shows the West Burning Ground and the Trap Sand piles as still present on the site. These materials have been remediated. Please refer to General Comments, "Waste Locations".

5. Table 1 does not acknowledged the Clean Sites certification of the RIS or CDEP's review and concurrence with the numerous voluntary corrective measures.

6. Table 2 states that there are no containment factors for the Anixter Area or the Southeast Kettle. In fact, waste in both locations is located beneath a soil cover.

7. Table 2 identifies Shotgun Shell debris as potentially hazardous and does not explain for what reason. Olin has no information which would indicate that these spent shells are hazardous.

8. Table 2 identifies the presence of overpack drums at Southeast Kettle. We are unaware of any overpack in this area or elsewhere on the site.

9. The 1990-1991 ICM program included site pilot testing of soil vapor extraction at Anixter but not the actual installation of a system was deferred until 1994.

10. The municipal water wells serving Hamden are located in Cheshire, Connecticut. Hamden is served by an interconnected water supply which also utilizes surface water outside of the Mill River watershed (which includes Pine Swamp).

11. The report states that no specific information is available on the locations of residential wells in the area of Pine Swamp. Chapter 2 (Table 2-2) of the RIS documents such an inquiry during the completion of that study.

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